

1 The Honorable Marsha J. Pechman
2
3
4
5
6

7 **UNITED STATES DISTRICT COURT**
8 **WESTERN DISTRICT OF WASHINGTON**
9 **AT TACOMA**

10 JENNIFER BRITT, Individually and for
11 Others Similarly Situated,

12 Plaintiff,

13 vs.

14 CLALLAM COUNTY PUBLIC HOSPITAL
15 DISTRICT NO. 2 d/b/a OLYMPIC MEDICAL
16 CENTER, a Washington Municipal
17 Corporation,

18 Defendant.

19 Case No: 3:23-cv-05377-MJP

20 **STIPULATED MOTION AND**
21 **[PROPOSED] ORDER FOR**
22 **EXTENSION OF TIME TO SEND**
23 **SETTLEMENT NOTICES**

24 **NOTED FOR HEARING: 9/27/2024**

25 The Court previously granted preliminary approval of a class action settlement, wherein
26 the Court ordered the settlement administrator to mail and email the settlement notice packets to
27 the Class Members no later than 14 days after receipt of class data from Defendant Clallam
28 County Public Hospital District No. 2 d/b/a Olympic Medical Center (“Defendant”). *See* Dkt. #
38 at 16. That deadline is scheduled to fall on September 27, 2024.

29 Pursuant to Local Rules 7(d)(1) and 10(g), Plaintiff and Class Representative Jennifer
30 Britt (“Plaintiff”) and Defendant jointly move for an extension of time to mail and email the
31 settlement notice packets by two (2) weeks, until October 11, 2024.

32 The parties seek this extension of time to resolve differences related to the class list. The
33 parties agree additional time is needed to resolve these differences before the notice packets are
34 sent out.

35 This is the first request for an extension of time related to this deadline. The other
36 deadlines that would be affected by this extension would be those deadlines stemming from the
37

38 **STIPULATED MOTION FOR**
EXTENSION OF TIME TO
SEND NOTICES – Page 1

FRANK FREED SUBIT & THOMAS LLP
705 Second Avenue, Suite 1200
Seattle, WA 98104
Tel: (206) 682-6711

JOSEPHSON DUNLAP LLP
11 Greenway Plaza, Ste. 3050
Houston, TX 77046
Tel: (713) 352-1100

1 date notice is issued (*see* Dkt. # 38 at 16-17), which include the deadline for Class Members to
2 postmark requests to exclude themselves, or “opt-out,” or to file objections to the settlement (60
3 days from issuance of notice), the deadline for Class Members to submit signed opt-in consent
4 forms (60 days), and the deadline for the settlement administrator to provide a report (10 days
5 after close of notice period). *Id.*

6

7 Respectfully and jointly submitted on September 27, 2024 by:

8

/s/ William M. Hogg
Michael A. Josephson (*Pro Hac Vice*)
Andrew W. Dunlap (*Pro Hac Vice*)
William M. Hogg (*Pro Hac Vice*)
JOSEPHSON DUNLAP LLP
11 Greenway Plaza, Suite 3050
Houston, Texas 77046
Tel: (713) 352-1100
mjosephson@mybackwages.com
adunlap@mybackwages.com
whogg@mybackwages.com

14

Michael C. Subit, WSBA # 29189
FRANK FREED SIBUT & THOMAS LLP
705 Second Avenue, Suite 1200
Seattle, Washington 98104
Tel: (206) 682-6411
msubit@frankfreed.com

17

Richard J. (Rex) Burch
BRUCKNER BURCH PLLC
11 Greenway Plaza, Suite 3025
Houston, Texas 77046
Tel: (713) 877-8788
rburch@brucknerburch.com

21

William C. (Clif) Alexander (*Pro Hac Vice*)
Austin W. Anderson (*Pro Hac Vice*)
Carter T. Hastings (*Pro Hac Vice*)
ANDERSON ALEXANDER PLLC
101 N. Shoreline Blvd., Ste. 610
Corpus Christi, Texas 78401
Tel: (361) 452-1279
clif@a2xlaw.com
austin@a2xlaw.com
carter@a2xlaw.com

27

28 ORDER EXTENDING TIME
TO SEND NOTICES – Page 2

/s/ Kyle D. Nelson (w/ permission)
Charles N. Eberhardt
Kyle D. Nelson
Margo S. Jasukaitis
PERKINS COIE LLP
1201 Third Avenue, Suite 4900
Seattle, Washington 98101
Tel: (206) 359-8000
Fax: (206) 359-9000
ceberhardt@perkinscoie.com
kylenelson@perkinscoie.com
mjasukaitis@perkinscoie.com

Counsel for Defendant

FRANK FREED SIBUT & THOMAS LLP
705 Second Avenue, Suite 1200
Seattle, WA 98104
Tel: (206) 682-6711

JOSEPHSON DUNLAP LLP
11 Greenway Plaza, Ste. 3050
Houston, TX 77046
Tel: (713) 352-1100

Attorneys for Plaintiff, Class, and Collective Members

[PROPOSED] ORDER

IT IS SO ORDERED.

The deadline for ILYM Group to mail and email the Notice Packets to Class Members shall be extended until October 11, 2024.

Dated this 30th day of September, 2024.

Wesley F. Releman

THE HONORABLE MARSHA J. PECHMAN
United States District Judge